

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

DOCKET NO. 4:19-cv-11093-TSH

PAUL JONES,

Plaintiff

v.

MONTACHUSETT REGIONAL TRANSIT
AUTHORITY, Et Al.,

Defendants

DEFENDANTS' PROPOSED
SCHEDULING ORDER

Pursuant to the Court's March 15, 2021 Order, Defendants, Montachusett Regional Transit Authority (MART), and Rebecca Badgley, Donna Landry, Bonnie Mahoney, Karen Cordio, Joanne Norris, Stephanie Richards, Tamara Shumovskaya, Jessica Torres, Amanda Kukta, Robert Monk, Michelle Moyo, Ivan Roman, and Crystal Geisert (collectively "Defendants") hereby propose the following scheduling order setting forth discovery Defendants seek to further demonstrate that MART is not Plaintiff's employer under Title VII and Chapter 151B. Defendants continue to assert that no additional discovery is required particularly because the documents that Defendants seek are all in Plaintiff's possession.

1. Defendants will propound one set of requests for production of documents seeking the following category of documents:
 - a. All W-2, 1099 or other tax forms Plaintiff received from Commonwealth Community Recovery Division, Inc. (CCRD) from 2016 to the present;
 - b. Plaintiff's state and federal income tax forms from 2016 to 2020;
 - c. Any and all documents that show Plaintiff and/or CCRD performing work for transit authorities other than MART;

- d. Plaintiff's submission of CCRD's proposed rates to MART;
- e. Plaintiff's communications with MART regarding his schedule and hours during the day he was available to provide transit for MART customers;
- f. CCRD handbooks and/or other employee policies;
- g. Documents identifying CCRD employees, dates worked, position(s) held and amount paid; and
- h. CCRD and/or Plaintiff's policies of insurance, including workers compensation insurance policy(s), general liability insurance policy(s) and automobile insurance policy(s) for vehicles driven when transporting MART customers.

2. Defendants will be able to complete the proposed discovery within sixty (60) days of the Court ordered Status Conference, June 28, 2021.
3. Defendants will file a supplemental motion for Summary Judgment by July 27, 2021.

DEFENDANTS
MONTACHUSETT REGIONAL TRANSIT
AUTHORITY et al,

By their attorneys,

/s/ Deborah I. Ecker

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Dated: April 20, 2021

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CERTIFICATE OF SERVICE

I, Deborah I. Ecker certify that the above document will be served by first-class mail upon any party or counsel of record who is not a registered participant of the Court's ECF system, upon notification by the Court of those individuals who will not be served electronically.

Date: April 20, 2021

/s/ Deborah I. Ecker